

MCDONNELL DOUGLAS

Douglas Aircraft Company

21 November 1990
C1-Q6C-RMT-90-226

U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Attention: Ms. Jean Daniel

Reference: Warning Letter dated 23 October 1990 from USEPA to the Douglas
Aircraft Company

Dear Ms. Daniel:

In response to the referenced warning letter Douglas Aircraft Company (DAC) is herewith submitting information addressing the four areas of potential noncompliance identified in the RCRA Compliance Evaluation Report dated October 1, 1990. Each of these areas are addressed separately below.

(1) Classification of cyanide waste streams.

The two (2) 55-gallon drums identified as sodium cyanide waste with a P106 waste code contained a discarded commercial chemical product (98% sodium cyanide). The contents of the two drums were repackaged into ten (10) small fiberboard containers and sent for destructive incineration under the P106 waste code (Attachment 1, Line 28b; Attachment 2, Line 28d).

The six (6) 30-gallon drums initially identified as copper cyanide waste with a P029 waste code contained a discarded commercial chemical product (Perlton 45) intended for use as a heat treat salt. The product, containing up to 38% Sodium Cyanide, was repackaged into 39 small fiberboard containers and recoded as P030. All containers were shipped for destructive incineration on October 4, 1990 (Attachment 1, Line 11d).

The ten (10) drums originally identified as cyanide wastes with a P030 waste code and the single drum identified as cyanide filters contained materials (floor boards, bricks, personal protective equipment, filters, rags) exposed to cyanide. The contents of these drums were classified as non-RCRA waste and shipped for destructive incineration on October 4, 1990 (Attachment 1, Line 11c & 28b). The classification of the waste was based on contractor knowledge of the waste stream. Please note, however, that in accordance with DAC's waste management practices the material was disposed of in the same manner as a RCRA regulated waste.

- (2) No accumulation start date on one (1) waste drum.

The drum identified as desmut filter cake contained a non-RCRA waste which was shipped for land disposal on October 19, 1990 (Attachment 3, Line 11a).

- (3) Inadequate aisle space.

The drums in the bay designated for acidic wastes were rearranged into a single aisle (Attachment 4) to allow unobstructed movement of material/personnel in the event of an emergency.

The personnel who work in the hazardous waste accumulation yard have been instructed to maintain adequate aisle space throughout building 47. In order to help insure that adequate aisle space is maintained at all times, an item has been added to the daily inspection checklist which requires that personnel in the waste accumulation yard check for adequate aisle space.

- (4) No Land Disposal Restriction Forms on file.

Since the date of the RCRA Compliance Evaluation Inspection DAC has maintained copies of all LDR notifications on file with the manifests.

A written request for copies of all Land Disposal Restriction notifications which accompanied waste shipments made prior to August 21, 1990 is being prepared. This request will be sent to all appropriate TSDFs by December 31, 1990 in an attempt to retrieve the necessary documentation to fulfill the recordkeeping requirements of 40CFR Part 268.7(a)(6).

If you have any further questions regarding these issues please contact either Dave Ganoung at 213/593-4285 or the undersigned at 213/497-5175.

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Sincerely,



Janet J. Bell
Manager - Environmental Compliance
Safety & Environmental Affairs